

KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | SUITE 7110
NEW YORK, NEW YORK 10118
TEL (212) 763-0883 | FAX (212) 564-0883
WWW.KAPLANHECKER.COM

DIRECT DIAL (212) 763-0883
DIRECT EMAIL: shecker@kaplanhecker.com

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DGC#:
DATE FILED: 2/3/2020

MEMO ENDORSED

January 31, 2020

BY ECF

Honorable Colleen McMahon
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Chambers 2550
New York, New York 10007

Violation Proceeding adj
to March 11, 2020 At 2:15.

Colleen McMahon
2/3/2020

Re: U.S.A. v. Fernandez et al, 12-cr-445-CM-10

Dear Chief Judge McMahon:

Lamont Robinson

I write with the consent of the Government and the Probation Department to request an adjournment of our upcoming Violation of Supervised Release (VOSR) hearing for defendant Lamont Robinson, which is currently scheduled for February 6, 2019 at 2:30 pm.

Procedural History

We first appeared on this matter in front of Your Honor on September 23, 2019. A VOSR hearing in this case was originally scheduled for November 19, 2019. With the consent of the Government and the Probation Department, we previously requested two adjournments of that hearing, which the Court granted. The hearing was adjourned to February 6, 2019 at 2:30 pm.

Request for Adjournment

Mr. Robinson currently has an open criminal case in Bronx County (#01086-2019) for which the next scheduled appearance is on March 10, 2020. In the interim, Mr. Robinson's counsel in the state case is waiting to receive additional discovery and a certificate of compliance from the District Attorney in the Bronx pursuant to New York State's recently enacted discovery reforms. See N.Y. CPL § 245. The alleged criminal conduct in the Bronx forms the bases for the alleged violations of the conditions of Mr. Robinson's supervised release. With the consent

KAPLAN HECKER & FINK LLP

2

of the Government and the Probation Department, I am requesting a further adjournment to give the parties time to see whether and how the Bronx matter is resolved before we determine next steps in this matter. I ask further that Mr. Robinson's current conditions of release remain in place until our next appearance.

Respectfully submitted,



Sean Hecker

cc: (by ECF)

Kevin Sullivan and Andrew Adams
Assistant United States Attorneys

Erin Weinrauch
United States Probation Officer